

**TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.**

ATTORNEYS AT LAW  
40 EXCHANGE PLACE  
18TH FLOOR  
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE  
(212) 482-1303 FAX  
WWW.TALKINLAW.COM  
E-MAIL: INFO@TALKINLAW.COM

MEMO ENDORSED

MARYLAND OFFICE:  
5100 DORSEY HALL DRIVE  
SUITE 100  
ELLCOTT CITY, MD 21042

410-964-0300

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 12/3/21
--

NEW JERSEY OFFICE:  
2500 PLAZA 5  
HARBORSIDE FINANCIAL CENTER  
JERSEY CITY, NJ 07311

201-342-6665

December 1, 2021

Honorable Colleen McMahon  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

BY ECF

Re: United States v. James Cahill  
20 Cr. 521 (CM)

12/2/2021

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring and travel restrictions. By this letter, Cahill respectfully makes two temporary bail modification applications. On Christmas Eve, Cahill respectfully requests permission to travel to his son's home in Franklin Lakes, New Jersey from 4:00 pm to 10:00 pm to celebrate Christmas with his children and grandchildren and on Christmas Day, to his sister's home in Tappan, New York from 4:00 pm to 10:00 pm to celebrate Christmas with his siblings and other close family members. The exact addresses of the homes are known to Pretrial Services ("PTS") and the government. The government, by Assistant United States Attorney Jason Swergold, consents to this application and PTS, by United States Pretrial Service Officer Andrew Abbott, does not consent due to their policy on social travel for defendants on home detention.

Thank you for Your Honor's consideration of these requests.

Very truly yours,

*Sanford Talkin*

Sanford Talkin

cc: AUSA Jun Xiang (by ECF)  
AUSA Danielle Sassoon (by ECF)  
SAUSA Laura de Oliveira (by ECF)  
USPTO Andrew Abbott (by email)